

EXHIBIT 1 TO ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHRISTMAS TREE SHOPS, LLC, *et al.*,¹

Debtors.

Chapter 7

Case No. 23-10576 (TMH)

(Jointly Administered)

GEORGE L. MILLER, in his capacity as Chapter
7 Trustee of CHRISTMAS TREE SHOPS, LLC
et al.,

Plaintiff,

vs.

LANE REFRIGERATION COMPANY, INC.
d/b/a LANE ASSOCIATES,

Defendant.

Adv. Proc. No. 25-50838 (TMH)

**STIPULATION FOR FURTHER EXTENSION
OF TIME FOR THE DEFENDANT TO ANSWER THE COMPLAINT**

Plaintiff, George L. Miller in his capacity as chapter 7 trustee of Christmas Tree Shops LLC, *et al.*, (the “**Plaintiff**”), for the estates of the above-captioned debtors (the “**Debtors**”) in the above-captioned cases pending under chapter 7 of title 11 of the United States Code (the “**Bankruptcy Code**”), by and through his undersigned counsel and defendant Lane Refrigeration Company, Inc. d/b/a Lane Associates (the “**Defendant**,” and together with Plaintiff, the “**Parties**”), enter into this *Stipulation for Further Extension of Time for Defendant to Answer the*

¹ The Debtors in these chapter 7 cases and the last four digits of each Debtor’s U.S. tax identification number are as follows: Christmas Tree Shops, LLC (1207), Handil, LLC (1150), Handil Holdings, LLC (2891), Salkovitz Family Trust 2, LLC (8773), and Nantucket Distributing Co., LLC (1640).

Complaint (the “**Stipulation**”) and hereby stipulate and agree as follows:

1. The Parties agree and stipulate that the time within which the Defendant may answer the *First Amended Complaint* [D.I. 3] in the above-captioned adversary proceeding is hereby further extended to and including September 20, 2025.

2. Except as specifically set forth herein, the Parties reserve all of their respective rights in this matter.

Dated: August 21, 2025

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PACHULSKI STANG ZIEHL & JONES LLP

CONNOLLY GALLAGHER

/s/ Peter J. Keane

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*Counsel to Plaintiff George L. Miller, Chapter 7
Trustee of Christmas Tree Shops, LLC, et al.*